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765, 9 So. 443. Others hold that he can, and this seems the better view. *Townsend v. New York Central & H. R. R. Co.*, 56 N. Y. 295; *Skelton v. Lake Shore & M. S. Ry. Co.*, 29 Oh. St. 214. For the passenger is protected by his remedy for the loss of the ticket and the carrier's regulation requiring the production of tickets is justified in view of the impracticability of the conductor's passing upon the validity of excuses. *Bradshaw v. South Boston R. Co.*, 135 Mass. 407. The principal case suggests a modification of the first view based on a Texas statute requiring ticket collectors to wear a badge. It is arguable that delivery to an employee without a distinctive badge is negligence, but it would seem that in the ordinary course of travel a passenger would be justified in giving up his ticket to one in the company's uniform without looking for a badge or ascertaining if the badge were a proper one. The case would appear to set an unwarranted limitation on an undesirable rule.

CONFLICT OF LAWS — REMEDIES: RIGHT OF ACTION — REDRESS FOR TORT COMMITTED UNDER STATUTE OF FOREIGN STATE WHICH FORBADE RECOVERY OUTSIDE THE STATE. — An Alabama statute gave a right of action to workmen injured by reason of any defect of the premises where they were employed. ALA. CODE, § 3190. Section 6115 of the Code provided that actions for such injuries must be brought in a court of Alabama and not elsewhere. The plaintiff, having been injured, recovered against the defendant in Georgia. *Held*, that the recovery in Georgia was not in violation of the due faith and credit clause of the Constitution. *Tennessee Coal, I. & R. R. Co. v. George*, U. S. Sup. Ct., April 13, 1914.

As a general rule, an action for personal injuries is maintainable whenever the court has jurisdiction of the parties. *Dennick v. Railroad Co.*, 103 U. S. 11. See 26 HARV. L. REV. 283, 290. In creating a new right, however, the jurisdiction creating the right may place a special limitation upon it. This limitation affects the right no matter where sued upon. *Pollard v. Bailey*, 20 Wall. (U. S.) 520; *Fourth Nat. Bank v. Francklyn*, 120 U. S. 747. See 18 HARV. L. REV. 220, 221. The creator of the right may limit it even after it has arisen. *Davis v. Mills*, 194 U. S. 451. So in the principal case, Alabama might have made bringing a suit within the state a condition precedent to the existence of any right at all. That this was true of a statute of another state was the view of the minority of the court in *Atchison, T. & S. F. Ry. Co. v. Sowers*, 213 U. S. 55, 71; See criticism of case in 22 HARV. L. REV. 535. But the Alabama statute would seem not to be capable of such an interpretation. Hence the requirement for bringing suit was not a condition precedent to the right, but only a prohibition which the dissenting judges in the case cited admitted could be disregarded. The court's result seems clearly right.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — STATE REGULATION OF SALE OF STOCKS, BONDS AND OTHER SECURITIES. — A statute provided that foreign and domestic investment companies file full data regarding all issues of stocks, bonds and other securities with a Commission, that the Commission was authorized to prohibit a sale if it should find that the sale would in all probability result in loss to the purchaser; and, further, that there should be no sale for thirty days after the data was filed with the Commission. *Held*, that the statute is unconstitutional. *Alabama & New Orleans Transportation Co. v. Doyle* 210 Fed. 173.

For a discussion of the principles involved see NOTES, p. 741.

CONSTITUTIONAL LAW — POWERS OF LEGISLATURE: DELEGATION OF POWERS — VALIDITY OF STATE-WIDE REFERENDUM. — The legislature passed a statute that was to become operative as a law if the majority of the people